

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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NICOLE STEWART, ELIZABETH  
AGRAMONTE and SUMMER APICELLA,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

-against-

CASE NO.  
2:21-cv-00678-JS-AYS

HAIN CELESTIAL GROUP, INC.,

Defendant.

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SALLY BREDBERG and REBECCA  
BROMBERG, individually and on behalf of  
all others similarly situated,

Plaintiffs,

-against-

2:21-cv-00758

THE HAIN CELESTIAL GROUP, INC.,

Defendant.

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ALYSSA MAYS, individually and on behalf  
of all others similarly situated,

Plaintiffs,

-against-

2:21-cv-00805

HAIN CELESTIAL GROUP, INC.,

Defendant.

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MICHELLE WALLS, on behalf of herself  
and all others similarly situated; and N.W.,  
a minor child, by his parent and general  
guardian Michelle Walls, on behalf of himself  
and all others similarly situated,

Plaintiffs,

-against-

1:21-cv-00870

BEECH-NUT NUTRITION COMPANY;  
THE HAIN CELESTIAL GROUP, INC.;  
NURTURE, INC. D/B/A HAPPY FAMILY  
ORGANICS; GERBER PRODUCTS  
COMPANY; and PLUM PBC.,

Defendants.

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LEE BOYD, individually and on behalf of all  
others similarly situated,

Plaintiff,

-against-

2:21-cv-00884

HAIN CELESTIAL GROUP, INC.,

Defendant.

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KELLY MCKEON, RENEE BRYAN, and  
MARILYN CARSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

-against-

2:21-cv-00938

HAIN CELESTIAL GROUP, d/b/a Earth's  
Best Organics,

Defendant.

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LEIBA BAUMGARTEN, individually and on  
behalf of all others similarly situated,

Plaintiff,

-against-

2:21-cv-00944

THE HAIN CELESTIAL GROUP, INC.,

Defendant.

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CHARLOTTE WILLOUGHBY,

Plaintiff,

-against-

2:21-cv-00970

HAIN CELESTIAL GROUP, d/b/a Earth's  
Best Organics,

Defendant.

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**DECLARATION OF JANINE L. POLLACK IN FURTHER SUPPORT OF THE *STEWART*  
PLAINTIFFS' MOTION FOR CONSOLIDATION AND TO SET DEADLINES**

**JANINE L. POLLACK** declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,  
that the following is true and correct:

1. I am a member of Calcaterra Pollack, LLC, counsel for Plaintiffs Nicole Stewart,  
Elizabeth Agramante, and Summer Apicella in the above-captioned actions.

2. I submit this declaration in further support of the *Stewart* Plaintiffs' Motion for  
Consolidation and to Set Deadlines. This declaration is made upon personal knowledge, except  
where otherwise noted.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Consolidation Order  
entered on March 15, 2021 in *Keeter v. Gerber Products Co.*, 1:21-cv-00269-LO-TCB (E.D. Va.),

ECF No. 8.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Plaintiffs' Stipulation [and Proposed Order] to Consolidate Actions under Fed. R. Civ. P. 42(a) and Order entered on March 19, 2021 in *Thomas et al. v. Beech-Nut Nutrition Co.*, 1:21-cv-0133-TJM-CFH (N.D.N.Y.), ECF No. 55.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Order Consolidating Cases entered on March 9, 2021 in *Gulkarov v. Plum PBC*, No. 21-cv-00913-YGR (N.D. Cal.), ECF No. 14.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Related Case Order entered on March 18, 2021 in *Gulkarov v. Plum PBC*, No. 21-cv-00913-YGR (N.D. Cal.), ECF No. 22.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 22, 2021  
New York, New York

/s/ Janine L. Pollack  
JANINE L. POLLACK

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 22, 2021, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Janine L. Pollack  
Janine L. Pollack